

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

November 28, 2023

To,
Shri. Sudhansh Pant,
Secretary,
Ministry of Health and Family Welfare,
Government of India,
Nirman. Bhavan,
Delhi -110011.

CONVENER

Dr. Arun Gupta
Child Health & Nutrition
Advocate
Mobile: 9899676306

MEMBERS

Prof. HPS Sachdev
Senior Pediatrician &
Epidemiologist

Dr. Vandana Prasad
Community Pediatrician

Prof. KP Kushwaha
Pediatrician & Former
Principal, BRD Medical
College Gorakhpur

Dr Prasanta Tripathy
Co Founder Ekjut

Prof. Umesh Kapil
Professor, Dept of
Epidemiology,
Biostatistics And Clinical
Research, I LBS

Dr. J.P. Dadhich
Child Health & Nutrition
Advocate

Ms. Nupur Bidla
Social Worker

Ms. Yashika
Nutritionist

ADDRESS

NAPi
BP-33, PITAMPURA,
DELHI-110034
CONTACT NO- 42683059

napiindia.in@gmail.com
www.napiindia.in

Subject: Acceleration of implementation of the National multi -sectoral Plan of Action (NMAP) for Prevention and Control of common Noncommunicable Diseases (NCDs) (2017-22)–Strategic action area : Health Promotion with the key outcome to reduce the risk factors i.e., consumption of unhealthy diets.

Dear Sir,

Greetings from Nutrition Advocacy in Public Interest (NAPi)!

NAPi is a national think tank on nutrition –consisting of independent experts in epidemiology, human nutrition, community nutrition and paediatrics, medical education, administration, social work and management. The members have decades of experience in their respective fields and have come together since 2016 to advocate on nutrition policy in public health interest.

Concerned over the rising obesity, diabetes and other NCDs, to build a case for accelerated implementation of the National multi -sectoral Plan of Action (NMAP) for Prevention and Control of common Noncommunicable Diseases (NCDs) (2017-22), NAPi submits as under:-

1. It is concerning that India is facing a public health crisis of rapid escalation of NCDs, as 1 in 4 persons is obese, and either diabetic or pre-diabetic according to 2023 report of ICMR, Government of India. There are nearly 10 Crore diabetics in India, the number has rapidly gone up over the last decade.
2. The country has set the target to halt the rise of obesity and diabetes by 2025 as per the NMAP and recognizes that unhealthy diets are risk factors for NCD.
3. We understand that the NMAP has been developed through series of consultations with various stakeholders including various ministries and departments. The plan offers a roadmap and menu of policy options to guide multi -sectoral efforts towards attaining these NCD targets.
4. The purpose of the NMAP states “The Action Plan will ensure a holistic approach embracing policy, legal and structural components necessary to address complex social determinants of NCDs and their risk factors”. The NMAP further recognizes that creating an enabling environment can be achieved by “...appropriate legislative, regulatory and fiscal measures” and identified reduction in “unhealthy diets” as a risk factor in children, adolescents, and adults. It also notes that the ‘unchallenged aggressive marketing’ strategies of unhealthy foods and beverages is a problem in the context of unhealthy diets.

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5. As per a recent WHO report consumption of unhealthy diets (ultra-processed foods or HFSS foods) is rising in India by 13.7 % annually. The latest BMJ article, <https://www.bmj.com/content/bmj/383/bmj-2023-075294.full.pdf> explains why policies to reduce the consumption of unhealthy diets cannot wait. There is growing body of evidence that shows that increased consumption of ultra-processed foods leads to higher intake of calories, sugars and saturated fats. It also reduces intake of fiber, protein, and micronutrients. This turns the diets to be unhealthy. Unhealthy diets containing high fat/sugar/salt (HFSS) foods or ultra-processed foods are associated with an increased risk of obesity, type-2 diabetes and heart ailments.
6. The NMAP action plan identifies **specific action points** for the MOHFW(FSSAI) under the output 'Cost effective measures to reduce risk of NCDs implemented' by 2018-19. One of the important outputs is to regulate demerit goods including HFSS foods.
7. Following actions may be implemented by MoHFW in an accelerated manner considering the public health crisis.
 - a. **Objectively define HFSS foods**
 - b. **Implementation of interpretative front of pack labelling and detailed nutrient labelling at the back of pack**

We believe an urgent action in this direction can achieve meaningful results.

NAP*i*, therefore, urges you to accelerate the implementation of the above- mentioned policy measures to curb the ongoing epidemic of NCDs effectively by reducing the consumption of unhealthy ultra-processed or HFSS foods. This may be a significant step to achieve the set targets.

We keenly look forward to a positive response and would be happy to engage in any discussions, if required.

A line of acknowledgment shall be highly appreciated.

Sincerely yours



Dr. Arun Gupta
Convener, NAP*i*

Copy to:-

Secretary, Ministry of Information and Broadcasting
Secretary, Ministry of Law and Justice
Secretary, Ministry of Finance
Secretary, Ministry of Consumer Affairs
Secretary, Ministry of Railways
Secretary, Ministry of Commerce and Industry